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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

Defendants.	CITY OF PORTLAND, a municipal corporation; IN DEFENSE OF ANIMALS, a foreign nonprofit corporation; ANIMAL LIBERATION FRONT, an unincorporated association; PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS, INC., a foreign nonprofit corporation; MATT ROSSELL; KEVIN MEIRAS aka "Bluejay";) CONNIE DURKEE; ALEX LILLI; JOHN DOES 1-10; and JANE DOES 1-10	*	SCHUMACHER FURS & OUTERWEAR, Plaintiffs.	OREGG SCHUMACHER and LINDA SCHUMACHER, individually and as husband and wife, and GREGG SCHUMACHER FURS LLC dba
) AFFIDAVIT OF CONNIE DURKEE)) CV 07 601 HU

AFFIDAVIT OF CONNIE DURKEE

State of Washington) ss:
County of Clark)

- I, Connie Durkee, being duly swom, depose and state:
- I make this affidavit based upon my personal knowledge.

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- Defendant in Defense of Animals "IDA". I am not and have never been associated with ALF in I am a named defendant in this lawsuit. I am one of two Oregon staff for
- did not consistently go, I have been there very few times since my father passed away in June. Portland to exercise my right of free speech with regard to issues relating to the fur industry. I I have previously gone to the area around the Schimacher Fur store in downtown
- I have never concealed my identity.
- plaintiffs' customers and other members of the public. Ņŧ I have not directed foul language or threats to plaintiffs, plaintiffs' employees,
- impeded the flow of traffic near Schumacher Furs. I have never entered plaintiffs' store at all. Schumacher Furs. I have not blocked public aidewalks with my body or signs. I have not **O** I have never engaged in public mudity in connection with profesting at
- employees -1 I have never been at or near the Schumachers' house or the residence of their
- leasing property to plaintiffs I have never spoken or written to any business entity that might have considered

.9 I have tried to conduct my free speech activities in a lawful and dignified manner

because I believe that is the best method for communicating my viewpoint towards others.

DATED

CONNIE DURKEE

// day of

2007,

SUBSCRIBED AND SWORN TO before me this

Notary Public in and for the State of Washington My Commission Expires: /~/\(\(\cdot\) \rightarrow \(\cdot\)

Notory Public State of Washington YING WONG Wintment Equires Joh 15, 2009

CERTIFICATE OF SERVICE

Durkee on the following person(s) on the date indicated below, by the following method: I hereby certify that I served a true copy of the foregoing Affidavit of Connie

 \ge by electronically mailed notice from the court on the date set forth below;

Office of the City Attorney 1221 SW Fourth Avenue, Suite 430 Portland, OR 97204 William M. Manlove <u>bmanlove@ci.portland.or.us</u>

Attorney for People for the Ethical wilsone@lanepowell.com Portland, OR 97204 601 SW 2nd Ave., Suite 2100 Treatment of Animals Lane Powell Eric Wilson

Attorneys at Law 4800 SW Griffith Ave., Ste. 320 Attorney for Plaintiffs Beaverton, OR 97005 hgrey.law1@verizon.net Herbert Grey

illodell@verizon.net Beaverton, OR 97005 10015 SW Terwilliger Blvd 4800 SW Griffith Ave., Ste. Attorney for Plaintiffs Jill Odell

Attorney for Plaintiffs Salem, OR 97302 960 Liberty Street SE, Suite 250 jonathan@jaclawoffice.com Jonathan A. Clark

DATED: May = _, 2007

Mark H-Don

Gregory Kafoury, OSB #74166
Mark G. McDougal, OSB #89086 Natalie McDougal, OSB #04250 (admission pending)